

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>1:12-cv-00841-SEB-MJD</u>
	)	
v.	)	
	)	
TOBY REEVES, HAOJIE WANG, DANIEL	)	
WATT, CAMERON GAFF, GIANCARLO	)	
DI MIZIO JR., SEAN MANGYIK,	)	
KRISTINE EIKENBERG, RAMAKANT	)	
MAMIDIDODDI, LEONARDO ALDANA,	)	
WILLIAM MEEKS SR. and JOHN DOES	)	
2, 3, 4, 5, 6, 10, 12, 13, 22 and 23,	)	
	)	
Defendants.	)	
	)	

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**PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION  
FOR AN ORDER TO SHOW CAUSE [CM/ECF 166]**

Plaintiff respectfully requests the Court deny Defendant’s motion because Plaintiff sent Defendant a copy of the motion and Defendant has not been prejudiced. Undersigned sent Defendant a copy of the Motion for Clerk’s Entry of Default [CM/ECF 158] on June 27, 2013 via first class mail. *See* Declaration of Paul Nicoletti. Pursuant to Fed. R. Civ. P. 5(b)(2)(C) “[a] paper is served under this rule by: mailing it to the person’s last known address—in which event service is complete upon mailing”. *Id.* Because undersigned complied with the Court’s order, Plaintiff respectfully requests the Court deny Defendant’s motion.

Dated: August 8, 2013

Respectfully submitted,

NICOLETTI & ASSOCIATES, PLLC

By: /s/ Paul J. Nicoletti  
Paul J. Nicoletti, Esq. (P44419)  
36880 Woodward Ave, Suite 100  
Bloomfield Hills, MI 48304  
Tel: (248) 203-7800  
Fax: (248) 203-7801  
E-Fax: (248) 928-7051  
Email: [paul@nicoletti-associates.com](mailto:paul@nicoletti-associates.com)  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system. I also hereby certify that on August 8, 2013, pursuant to this Court's order dated May 21, 2013 [CM/ECF 158], I served copies of all of Plaintiff's filings via Federal Express on pro se Defendant Haojie Wang, 1117 Anthrop Ar. Apt 2, West Lafayette, IN 47906.

By: /s/ Paul J. Nicoletti